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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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Attorneys for Plaintiff
United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Charles Wurm,

Defendant.

2:16-CR-00070-GMN-VCF

Pretrial Diversion Agreement

You have been charged in a Criminal Indictment filed on March 9, 2016, in the United States District Court for the District of Nevada, with conspiracy to commit wire fraud and wire fraud, in violation of Title 18, United States Code, Sections 1349 and 1343, respectively. Essentially the indictment alleges the following:

During 2010 and mid-2011, you conspired with Curtis Pope and others to obtain protected trade secret information from the victim company Selling Source which engaged in selling business leads for payday loans. At one time, Pope and other co-conspirators worked for Selling Source. You participated in their scheme to steal leads and to sell them to Selling Source's competitors. You provided IT technical assistance, and you contact one competitor to discuss the availability of leads.

1 Upon accepting responsibility for your behavior and by your signature on this Agreement, it
2 appearing after an investigation of the offense and your background, that the interests of the United
3 States and your own interests and the interests of justice will be served by the following procedure,
4 on the authority of the Attorney General of the United States, by Steven W. Myhre, Acting United
5 States Attorney for the District of Nevada, prosecution in this District for these offenses shall be
6 deferred for a period of 12 months from this date, provided you abide by the following conditions
7 and requirements of this Agreement as set forth hereafter.

8 Should you violate the conditions of this Agreement, the United States Attorney may revoke
9 or modify any conditions of this Pretrial Diversion Program. The United States Attorney may release
10 you from supervision at any time. The United States Attorney may at any time within the period of
11 your supervision re-initiate prosecution for these offenses should you violate the conditions of this
12 Agreement. In such an event, your statement accepting responsibility in this matter may be used
13 against you. In this case, he will furnish you with notice specifying the conditions of the Agreement
14 which you have violated.

15 After successfully completing your Pretrial Diversion Program and fulfilling all the terms
16 and conditions of the Agreement, no prosecution for the offenses previously set forth will be pursued
17 in this District, and the United States will move to have the charges against you dismissed.

18 **CONDITIONS OF PRETRIAL DIVERSION**

- 19 1. You shall not violate any federal, state, or local law. You shall contact your Pretrial
20 Diversion Program officer within 72 hours if you are arrested and/or questioned by any law
21 enforcement officer.
- 22 2. You shall not possess a firearm, ammunition, destructive device, or any other dangerous
23 weapon.
- 24 3. You shall not associate with any persons engaged in criminal activity and shall not associate
25 with any person convicted of a felony, unless granted permission to do so by your Pretrial
26 Services Officer.

4. You shall permit a Pretrial Services Officer to visit you at any time at home or elsewhere and shall permit confiscation of any contraband observed in plain view of the probation officer or Pretrial Services Officer.
5. You shall not leave the continental United States without the permission of the court or your Pretrial Services Officer.
6. You shall report to your Pretrial Services Officer in a manner and frequency directed by the court or your Pretrial Services Officer.
7. You shall answer truthfully all inquiries by your Pretrial Services Officer and follow the instructions of your Pretrial Services Officer.
8. You shall work regularly at a lawful occupation, unless excused by your Pretrial Services Officer for schooling, training, or other acceptable reasons.
9. You shall notify your Pretrial Services Officer at least ten days before you change your residence or employment.
10. You shall make restitution in the amount of \$10,000, ~~joint and~~ ^{DRS (LP) CW} severally with Curtis Pope, and shall make restitution in monthly payments at the rate of \$833.34 payable to the "CLERK, U.S. DISTRICT COURT." On your check or money order you shall write your name and case number, 2:16-cr-0070-GMN-VCF, and shall mail the payment or deliver it in person to U.S. Clerk's Office for the District of Nevada, Lloyd D. George Federal Courthouse, Clerk's Office, Room 1334, Las Vegas, Nevada, 89101, and are due by the 28th day of every month commencing with the first month after you have completed your Pretrial Diversion canvassing with the Court.


ACKNOWLEDGEMENT

I assert and certify that I am aware of the fact that the Sixth Amendment to the Constitution of the United States provides that in all criminal prosecutions the accused shall enjoy the right to a speedy and public trial. I am also aware that Rule 48(b) of the Federal Rules of Criminal Procedure provides that the Court may dismiss an indictment, information, or complaint for unnecessary delay in presenting a charge to the Grand Jury, filing an information or in bringing a defendant to trial. I hereby request that the United States Attorney for the District of Nevada to defer such prosecution. I agree and consent that any delay from the date of this Agreement to the date of re-initiation of prosecution or trial, as provided for in the terms expressed herein, shall be deemed to be a necessary delay at my request, and I waive any defense to such prosecution on the ground that such delay operated to deny my rights under Rule 48(b) of the Federal Rules of Criminal Procedure and the Sixth Amendment to the Constitution of the United States to a speedy trial or to bar the prosecution by reason of the running of the statute of limitations for a period of months equal to the period of his agreement.

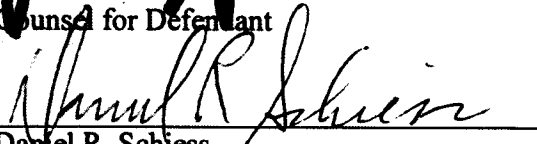
I hereby state that I have read the above and it has been explained to me in my native language. I understand the conditions of my Pretrial Diversion Program and agree that I will comply with them.


 Charles Wurm, Defendant

9/29/17
 DATE


 Louis Palazzo
 Counsel for Defendant

9/29/17
 DATE


 Daniel R. Schiess
 Assistant United States Attorney

10/3/17
 DATE


 U.S. Pretrial Services Officer

10/13/17
 DATE